REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed May 2, 2006. In the Office Action, the claims 1, 3, 14, and 16 stand rejected under 35 U.S.C. § 102, and claims 4, 9-13, 17, and 22-26 stand rejected under 35 U.S.C. § 103.

Applicant has amended independent claims 1 and 14 to further clarify embodiments of the invention.

Reconsideration in light of the amendments and remarks made herein is respectfully requested.

Rejection Under 35 U.S.C. § 102 and § 103

Claims 1, 3, 14, and 16 stand rejected under 35 U.S.C. § 102(b) as being allegedly anticipated by U.S. Patent No. 6,026,293 issued to Osborn (hereinafter Osborn). Further, claims 4, 9-13, 17, and 22-26 stand rejected under 35 U.S.C. § 103(a) as being allegedly obvious over Osborn.

Utilizing amended independent claim 1 as an example, Applicant has amended independent claims 1 and 14 such that they both generally include limitations generally related to: a system and method to uniquely identify a security computing device that is coupled to a computer...the computer coupled to a server over a computer network...comprising...a *security computing device separate* from the computer *connected to the computer over an input/output (I/O) link*...the *security computing device including a processor and a secure memory*...wherein when the computer attempts to log on to the server over the computer network...the server requests a serial number from the security computing device...the *security computing device under the control of the processor* transmits the serial number from the secure memory of the security computing device...the server verifies whether the serial number received from the security computing device is stored as one of the plurality of registered serial numbers in the user information database... and if the serial number is stored within the user information database...the server obtains the associated user key and computes a challenge and computes an expected response based on the associated user key...the server sends the challenge to the

security computing device over the computer network…wherein the *security computing device under the control of a processor computes a response based upon a user key stored in the secure memory of the security computing device*…and if the server receives the response back from the security computing device and the response to the challenge matches the expected response…the server allows the computer to log on to the server.

In the previous Office Action, the Examiner cited the Background Section of the Osborn reference as being relevant to the claims. Particularly, the Examiner cited col. 1, lines 55-60 of Osborn as being relevant to a computer or computing device being coupled to a server over a computer network. Upon closer inspection, it is apparent that Figure 1 cited by the Examiner and the associated text relates to <u>a cellular communications system.</u>

More particularly, the Examiner cites col. 2, lines 50-60 of the Background Section of Osborn as being relevant to a security device storing <u>a cell phone user subscriber's electronic serial number (ESN)</u> that is used in establishing a standard cellular connection.

On page 2 of the Office Action, the Examiner states that col. 2, line 59-60 of Osborn teaches that the serial number is stored in a secure memory (SIM) of the cell phone. However, col. 2, lines 59-60 of Osborn states: "The ESN is typically set by the mobile telephone manufacturer." Applicant will assume the Examiner means that a cell phone typically stores the ESN in the memory of the cell phone.

In contrast to Osborn, Applicant's amended independent claims 1 and 14 require a *security computing device* separate from the computer *connected to the computer over an input/output (I/O) link* and that the security computing device *includes a processor and a secure memory*.

This is <u>completely different</u> than a memory of a cell phone that stores a subscriber's electronic serial number as set forth in the Background Section of Osborn.

Therefore, Applicant respectfully submits that the amended limitations of independent claims 1 and 14 are clearly not taught or suggested by the Osborn reference.

It should be noted that the Examiner cited col. 3, lines 1-7, of the Background Section of Osborn, which illustrates a first prior art process of comparing an electronic serial number from a memory of a cell phone, and another prior art process of a challenge-response method for a mobile telephone that utilizes a user key, at col. 3, lines 21-35 of Osborn.

Applicant respectfully submits that these citations, either alone or in combination, <u>do not</u> teach or suggest the limitation set forth in Applicant's amended independent claims 1 and 14.

Further, the Examiner cites col. 7, lines 65-66 of Osborn as allegedly showing a security device containing a microprocessor and a memory. However, this reference is clearly to <u>controller 400 of the cellular telephone</u> itself that includes a microprocessor 402 and an internal read-only memory (IROM) 403.

This citation also does not teach or suggest a *security computing device* that is *separate* from a computer connected to the computer *over an I/O link* in which the separate security computing device includes a processor and a secure memory to accomplish the functionality as set forth in amended independent claims 1 and 14.

In fact, it should be noted that the invention as set forth in the Detailed Description of Osburn is <u>utilized to overcome the disadvantages set forth in the Background Section</u> of Osborn and the Examiner is utilizing <u>both</u> the Background and the Detailed Description in order to try to render obvious Applicant's claims.

Applicant respectfully submits that Osborn is related to a completely different invention and <u>does not</u> teach or suggest Applicant's amended independent claims 1 and 14 which relate to: a *security computing device* that is *separate* from a computer and that is *connected to the computer over an I/O link* in which the *security computing device includes a processor and a secure memory*.

Further, Osborn in no way teaches or suggests utilizing a <u>separate</u> *security computing device connected to a computer over an I/O link*...the separate security computing device *having a processor and a secure memory* that under the control of the processor of the security computing device computes a response as part of a challenge-response process with a server to

compute a response based upon a user key stored in the secure memory of the security computing device such that if the server receives a response to the challenge that matches the expected response, the server will allow the computer to log on to the server --- because the computer has been authenticated by the separate security computing device that may be connected to the computer.

Applicant respectfully submits that the challenge-response schemes for cell phones described in the Osborn patent in no way teach or suggest Applicant's amended independent claims 1 and 14.

Thus, because Osborn does not teach or suggest the limitations of Applicant's amended independent claims 1 and 14, Applicant respectfully requests that the Examiner allow these claims and pass them to issuance. Further, as to the claims that depend from the independent claims, Applicant respectfully requests that the Examiner likewise allow these claims and pass them to issuance.

Accordingly, Applicant respectfully requests that the Examiner pass all of these claims to issuance at the earliest possible date.

Conclusion

In view of the remarks made above, it is respectfully submitted that pending claims 1, 4, 9-14, 16-17, and 22-26 define the subject invention over the prior art of record. Thus, Applicant respectfully submits that all the pending claims are in condition for allowance, and such action is earnestly solicited at the earliest possible date. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application. To the extent necessary, a petition for an extension of time under 37 C.F.R. is hereby made. Please charge any shortage in fees in connection with the filing of this paper, including extension of time fees, to Deposit Account 02-2666 and please credit any excess fees to such account.

Respectfully submitted,

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Dated: 09-28-2006   By_____

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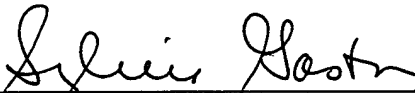### *CERTIFICATE OF MAILING/TRANSMISSION (37 CFR 1.8A)*

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Date: 09-28-2006   *Sylvia Gaston*   *Date*